

IN THE UNITED STATES OF AMERICA
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:16CR140
	§	Judge Crone
RANDALL WILLIAM WADE (1)	§	

MOTION FOR A PRELIMINARY ORDER OF FORFEITURE

The United States respectfully requests that the Court issue a preliminary order of forfeiture in this case. In support of its motion, the government states as follows:

1. On September 15, 2017, the United States of America obtained an Information against Defendant **Randall William Wade**.
2. The Information included a Notice of Intention to Seek Criminal Forfeiture pursuant to 18 U.S.C § 982(a)(1) and 21 U.S.C. § 853 that provided notice that the government intended to seek forfeiture of Defendant's interest in the following:
 - a. \$40,821.66 in United States currency seized from Independent Bank account x0250; and
 - b. \$140,676.59 in United States currency seized from Legacy Bank of Texas account x0667.
3. **Randall William Wade** entered a plea of guilty to Counts One through Ten of the Information.
4. The government requests the Court forfeit Defendant's right, title, and interest in the above-described property pursuant to the plea agreement negotiated between the parties.

5. Upon the issuance of a Preliminary Order of Forfeiture, the United States will provide written notice to all third parties asserting a legal interest in any of the above-described property to be forfeited, and will publish notice at www.forfeiture.gov of the Court's Order and the United States' intent to dispose of the property to be forfeited in such manner as the Attorney General may direct.

Conclusion

The government respectfully requests that the Court issue the proposed Preliminary Order of Forfeiture and forfeit to the government Defendant's interest in the aforementioned property.

Respectfully submitted,

BRIT FEATHERSTON
Acting United States Attorney

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via electronic filing to defense counsel on September 15, 2017.

_____/s/_____
HEATHER RATTAN